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August 30, 2024

**By ECF**

Hon. Andrew L. Carter, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: ***Sarah Goolden v. Hamed Wardak***  
**1:19 Civ. 6257 (ALC/VF)**

Dear Judge Carter:

We represent defendant/counterclaim-plaintiff Hamed Wardak (“Defendant”) in the above-referenced matter. We jointly submit this status report with counsel for plaintiff/counterclaim-defendant Sarah Goolden (“Plaintiff”) to provide the Court with a status update in response to the Court’s Order of August 16, 2024 (Dkt. No. 211).

**Recent Procedural History**

On October 19, 2023, Defendant made a motion for sanctions regarding a discovery dispute arising from Plaintiff’s production of a video recording. Plaintiff opposed the motion. (*See* Dkt. Nos. 199-205). On May 8, 2024, Honorable Valerie Figueredo issued an Opinion and Order, granting in part and denying in part the motion (the “Order”) (*see* Dkt. No. 208).

The Order awarded Defendant certain attorneys’ fees and costs, and ordered that Defendant’s deposition be redone in its entirety. Since the issuance of the Order, the parties have communicated regarding Defendant’s attorneys’ fees and costs. Defendant has provided Plaintiff with the invoices detailing the fees relevant to his award for review and remittance. Plaintiff has reviewed the invoices, sought additional information, and believes a lower number is correct and that litigation may be required. The parties are also working toward scheduling Defendant’s deposition.

Additionally, on August 13, 2024, Your Honor issued an Opinion and Order denying Plaintiff’s Motion to Dismiss Defendant’s counterclaim (*see* Dkt. No. 209).

**Discovery**

Aside from Defendant’s deposition, fact discovery is complete. The parties anticipate expert discovery, and request that the Court modify the discovery schedule to extend the date by which all expert discovery is to be completed, to a date following completion of Defendant’s deposition. The parties do not have any additional discovery issues to bring to the Court at this time.

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**Settlement Discussions**

The parties are not engaged in settlement discussions. The parties do not think it would be fruitful to be referred to Judge Figueredo for a settlement conference at this juncture. However, upon the completion of discovery, and in accordance with Your Honor's Individual Rules 4.A, the parties will revisit settlement discussions and as needed, request a settlement conference at that time.

Respectfully submitted,  
YANKWITT LLP

By:  \_\_\_\_\_

Benjamin Allee

cc: All counsel of record (via ECF)